

REMARKS

Applicant respectfully requests favorable reconsideration of this application, as amended.

Applicant thanks the Examiner for the indication of allowable matter in Claims 13 and 14.

Claim 1, has been amended, Claims 5-11 have been cancelled, and new Claim 18 has been added. Accordingly, Claims 1-4 and 12-18 are pending.

Applicant has amended the claims to more clearly distinguish the invention from the newly applied reference. More particularly, independent Claim 1 has been amended to recite that the claimed steering column assembly includes a steering column mounting bracket having, at its forward end, a deformable component that supports a subassembly of the steering column and that can collapse in the event of a vehicle crash, wherein the deformable component has a normal positional relationship with the mounting bracket in which it is restrained by two locating devices, each having at least one open slot in the mounting bracket, and a locating pin on the deformable component that mates with the respective open slot. This amendment incorporates the substance of Claims 5, 6, 7, and 8 into Claim 1 and thus raises no new issues.

New Claim 18, dependent from Claim 1 has been added to claim an embodiment of the invention wherein at least one of the slots is a laterally open slot.

Independent Claim 1 and dependent Claims 2-12, and also independent Claims 16 and 17 were rejected under 35 U.S.C. § 102(b) as anticipated by German Patent DE 32 21 644 (DE '644).

However, the DE '644 reference does not disclose or suggest the invention as now defined in amended Claim 1. Specifically, DE '644 does not disclose a collapsible steering column having, at a forward end thereof, a deformable component that supports a lower subassembly. Indeed, no lower subassembly is apparent in the drawings of DE '644, and the element 11, identified by the Office as a lower subassembly, is described by the reference as the steering post (column 4, line 4). Furthermore, the reference does not disclose a deformable component restrained in a normal relationship with a mounting bracket by two locating devices each having an open slot in the mounting bracket and a pin on the deformable component that mates with the open slot. Note, in particular, that the deformable component 16 of the reference is not restrained by any combination of an open slot and a pin mating with

the open slot. Thus, the DE '644 reference simply does not disclose or suggest the collapsible steering column as set forth in amended Claim 1. Accordingly, the Examiner is respectfully requested to withdraw the outstanding rejection of Claim 1.

Furthermore, new Claim 18 recites that the open slot is a laterally open slot. No such slot is disclosed in DE '644. Accordingly, Claim 18 is also patentably distinct from the disclosures of the reference.

Claims 2-4, dependent from amended Claim 1, are also patentable, at least as being dependent from an allowable claim. The rejection is moot as to cancelled Claims 5, 6, 7, and 8.

Insofar as applied to independent Claims 16 and 17, the rejection on DE '644 is untenable and therefore respectfully traversed.

Independent Claim 16 recites a mounting bracket including, at its end remote from the upper subassembly, a deformable bracket capable of deformation so as to allow movement of the lower subassembly toward the upper subassembly in the event of a vehicle crash. On the contrary, the deformable element disclosed in the DE '644 reference is arranged so that the upper portion thereof

moves forward in the event of a crash. Similarly, Independent Claim 17 recites a mounting bracket including, at its end remote from the upper subassembly, a deformable bracket capable of deformation toward the upper assembly to absorb impact of a primary collision.

As discussed in the specification at paragraph [0013], the collapsible steering column of the invention is designed to accommodate collapse from the front, in order to absorb impact energy from the impact of a primary collision. On the contrary, the steering column disclosed in DE '644 functions to absorb impact energy due to a secondary collision in a crash, i.e., the collision of the driver with the steering column. Thus, the steering column support of the DE '644 reference is designed to mitigate the effects of a secondary collision by allowing the upper end of the steering column to move forward. Applicant's invention, while not excluding the possible presence of a collapsible, energy-absorbing upper subassembly in the overall steering column structure, incorporates a deformable structure that supports a lower subassembly and allows the lower subassembly to move rearward during a primary collision and absorb some of the energy thereof.

Accordingly, Claims 16 and 17 claim an invention not disclosed or suggested in the DE '644 reference, and withdrawal of the rejection under 35 U.S.C. § 102(b) is respectfully requested.

Claim 15, dependent from Claim 1, was rejected under 35 U.S.C. § 103(a) as being unpatentable over DE 3521644 in view of Shimizu et al., U.S. Patent 5,704,641 (Shimizu). The deficiencies of the primary reference, DE '644, have been discussed above. As the Office recognizes, Shimizu adds only the feature that a steering column may incorporate structure to allow for adjusting the rake of the column, and contains no teaching regarding structure for absorbing the impact of a collision. In any case, Claim 15 is patentable at least as dependent from allowable amended Claim 1, and withdrawal of the rejection under 35 U.S.C. § 103(a) is respectfully requested.


In view of the above amendments and discussion, the claims are believed to be clearly patentable over the cited references.

Accordingly, a Notice of Allowance is respectfully solicited.

The Commissioner is hereby authorized to charge to Deposit Account No. 50-1165 any fees under 37 C.F.R. §§

1.16 and 1.17 that may be required by this paper and to credit any overpayment to that Account. If any extension of time is required in connection with the filing of this paper and has not been requested separately, such extension is hereby requested.

Respectfully submitted,

By:   
Mitchell W. Shapiro  
Reg. No. 31,568

MWS:GWS:jab

Miles & Stockbridge P.C.  
1751 Pinnacle Drive  
Suite 500  
McLean, Virginia 22102-3833  
(703) 610-8652

George W. Swenson  
Reg. No. 25,461

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